

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA**

JOSEPH ELWELL, CRYSTAL  
ELWELL, DEBORAH BALDWIN,  
Individually and as custodian for her  
Minor children WM and AM,  
ROBERT BALDWIN,

Plaintiffs,

v.

FIRST BAPTIST CHURCH OF  
HAMMOND, INC.,

Defendant.

Case No. 2:16-CV-158

Hon. James T. Moody, Judge

Mag. Judge Andrew Rodovich

**DEFENDANT'S MOTION TO QUASH  
THE DOCUMENT SUBPOENA ISSUED TO ATTORNEY DAVID GIBBS**

NOW COMES the Defendant, FIRST BAPTIST CHURCH OF HAMMOND, INC., by and through its attorneys, HeplerBroom, LLC, and hereby moves this Honorable Court, pursuant to Fed. R. Civ. P. 45(d)(3)(A)(iii), for an order quashing the Fed. R. Civ. P. 45 document subpoena issued to attorney David Gibbs. Defendant submits a Memorandum of Law, filed contemporaneously herewith and which is incorporated by reference herein.

Respectfully submitted,

HeplerBroom, LLC

/s/ Rick Hammond

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 28, 2016, I electronically filed the foregoing, ***Defendant's Motion to Quash the Plaintiffs' Subpoena to Attorney David Gibbs***, with the Clerk of the Court using the CM/ECF system, which will send notification of such filing(s) to the following attorneys of record.

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/s/ Rick Hammond